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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) CASE NOS. 20 CR-0108 JD
Plaintiff,)
v.)
SUSAN ARREOLA-MARTIN,) STIPULATION TO CONTINUE RESTITUTION
CHRISTOPHER POOL,) HEARING FROM AUGUST 15, 2022 TO
and) SEPTEMBER 12, 2022; [PROPOSED] ORDER
LEIF SKOROCHOD)
Defendants.)

The parties to the above-captioned matter jointly file this Stipulation and Proposed Order asking the Court to reset the restitution hearing presently set for August 15, 2022, be reset for September 12, 2022. As grounds for this request, the parties state the following:

1. On July 13, 2021, the government filed a superseding indictment in the above-captioned case. Dkt. 182.

1 2. On December 20, 2021 and on February 14, 2022, defendants Christopher Pool, Susan
2 Arreola-Martin, and Leif Skorochod pleaded guilty pursuant to plea agreements. Dkt. 267, 292, 293.

3 3. On May 23, 2022, the Court sentenced Susan Arreola-Martin and Christopher Pool to 84
4 months' and 15 months' imprisonment, respectively. Dkt. 323, 324. During the sentencing hearings,
5 the Court indicated that it would make a restitution order in this case requiring the defendant to pay
6 restitution to the victims. The Judgment and Commitment orders entered on June 13, 2022, confirmed
7 that restitution in this case "was to be determined." Dkt. 329, 332.

8 4. On June 13, 2022, the Court sentenced Leif Skorochod to 14.5 months' imprisonment.
9 Dkt. 333. During the sentencing hearings, the Court indicated that it would make a restitution order in
10 this case requiring the defendant to pay restitution to the victims. The Judgment and Commitment
11 orders entered on June 29, 2022, confirmed that restitution in this case "was to be determined." Dkt.
12 335.

13 5. At the sentencing hearings for these defendants, the United States represented that it
14 intended to seek stipulations regarding the restitution orders. In the meantime, the Court set a date for a
15 restitution hearing of August 15, 2022, should the parties failed to reach agreement.

16 6. Since the sentencing hearings, the United States has been diligently seeking information
17 from the victims in this case regarding the proper payees for the restitution orders. To date, however,
18 although it has identified the payees and restitution amounts for most of the fraudulent loans, there are
19 two payees yet to produce documents to support the restitution amounts. The United States anticipates
20 receiving those materials within the next two weeks, but not in time to complete the stipulations in
21 advance of the August 15, 2022, hearing date.

22 7. The parties have conferred, and counsel for the United States and counsel for the
23 defendants, have agreed to continue the restitution hearing until September 12, 2022, so that the parties
24 may continue to seek to agree to and stipulate to the restitution amounts to be included in the amended
25 Judgement and Commitment Orders.

26 8. The parties also agree and stipulate that, under *United States v. Dolan*, 560 U.S. 605
27 (2010), this Court is not prohibited from entering a restitution order after the 90-day period set forth in
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1 18 U.S.C. § 3664(d)(5) because it made clear at the hearing on May 23, 2022, that it would order
2 restitution in this case, leaving open only the amount of restitution to be ordered.

3 The undersigned Assistant United States Attorneys certify that they have obtained approval from
4 counsel for the defendants to file this stipulation and proposed order.

5 IT IS SO STIPULATED.

6

7 DATED: August 5, 2022

Barbara J. Valliere
BARBARA J. VALLIERE
DAVID J. WARD
Assistant United States Attorneys

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10 DATED: August 5, 2022

/s/ with permission
CHARLES WOODSON
Attorney for Defendant POOL

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DATED: August 5, 2022

/s/ with permission
CHARLES WOODSON
Attorney for Defendant POOL

/s/ with permission
KENNETH WINE
Attorney for Defendant ARREOLA-MARTIN

/s/ with permission
STEVEN KALAR
Attorney for Defendant SKOROCHOD

[PROPOSED] ORDER

Based upon the facts set forth in the stipulation of the parties, and for good cause shown, the Court hereby orders that the restitution hearing set for August 15, 2022, at 10:30 a.m. is continued to September 12, 2022, at 10:30 a.m.

IT IS SO ORDERED.

DATED: August 9, 2022


HON. JAMES DONATO
United States District Judge